

CHONG, NISHIMOTO, SIA, NAKAMURA
& GOYA, A Limited Liability Law Partnership

JEFFREY H. K. SIA 3029-0
STEVEN L. GOTO 6041-0
1003 Bishop Street, Suite 2500
Honolulu, Hawaii 96813
Telephone No.: (808) 537-6119
Facsimile No. (808) 526-3491
Jeffrey.Sia@hawadvocate.com
Steven.Goto@hawadvocate.com

Attorneys for Counterclaim Defendant
TRENDTEX FABRICS, LTD.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

TRENDTEX FABRICS, LTD.,)	CIVIL NO. 1:22-CV-00287 LEK/KJM
)	
Plaintiff,)	COUNTERCLAIM DEFENDANT
vs.)	TRENDTEX FABRICS, LTD.'S
)	JOINDER IN PLAINTIFF'S
NTKN, INC., a Hawaii corporation;)	DISCOVERY REQUESTS TO
HUNG KY, an individual; SHAKA)	NTKN, INC. AND HUNG KY;
TIME, INC., a Hawaii corporation;)	CERTIFICATE OF SERVICE
TROPIHOLIC, INC., a Florida)	
corporation,)	
Defendants.)	
NTKN, INC.,)	
Counterclaim)	
Plaintiff,)	
vs.)	
)	
TRENDTEX FABRICS, LTD.,)	
)	
Counterclaim)	Trial Date: March 18, 2024
Defendant,)	Trial Judge: Hon. Leslie E. Kobayashi

#1265208

COUNTERCLAIM DEFENDANT TRENDTEX FABRICS, LTD.'S JOINDER
IN PLAINTIFF'S DISCOVERY REQUESTS TO NTKN, INC.

COMES NOW Counterclaim Defendant TRENDTEX FABRICS, LTD., in the above-captioned matter, and hereby joins in the following discovery requests from Plaintiff TrendTex Fabrics, Ltd. to Defendant and Counterclaim Plaintiff NTKN, Inc., and Hung Ky:

1. PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS NTKN, INC. AND HUNG KY, DATED OCTOBER 17, 2022
2. PLAINTIFF'S SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS NTKN, INC. AND HUNG KY DATED FEBRUARY 21, 2023
3. PLAINTIFF'S THIRD SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS NTKN, INC. AND HUNG KY, DATED MARCH 14, 2023
4. PLAINTIFF'S FOURTH SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS NTKN, INC. AND HUNG KY, DATED APRIL 25, 2023

To the extent Defendant and Counterclaim Plaintiff NTKN, Inc., and Hung Ky have already responded to the foregoing, they need not send a duplicate response to Counterclaim Defendant. However, Counterclaim Defendant **requests a copy of any future responses be sent to its counsel of record, including any future communications** in connection therewith.

DATED: Honolulu, Hawaii, May 1, 2023.

/s/ Steven L. Goto

JEFFREY H. K. SIA

STEVEN L. GOTO

Attorneys for Counterclaim Defendant

TRENDTEX FABRICS, LTD.

COUNTERCLAIM DEFENDANT TRENDTEX FABRICS, LTD.'S JOINDER IN
PLAINTIFF'S DISCOVERY REQUESTS TO NTKN, INC AND HUNG KY;
Trendtex Fabrics, Ltd. v. NTKN, Inc., et al., Case No. 1:22-cv-00287-LEK-KJM,
United States District Court for the District of Hawaii

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

TRENDTEX FABRICS, LTD.,)	CIVIL NO. 1:22-CV-00287 LEK/KJM
)	
Plaintiff,)	CERTIFICATE OF SERVICE
vs.)	
)	
NTKN, INC., a Hawaii corporation;)	[Counterclaim Defendant Trendtex
HUNG KY, an individual; SHAKA)	Fabrics, Ltd.'s Joinder in Plaintiff's
TIME, INC., a Hawaii corporation;)	Discovery Requests to NTKN, Inc.]
TROPIHOLIC, INC., a Florida)	
corporation,)	
Defendants.)	
NTKN, INC.,)	
Counterclaim)	
Plaintiff,)	
vs.)	
)	
TRENDTEX FABRICS, LTD.,)	
)	
Counterclaim)	Trial Date: March 18, 2024
Defendant,)	Trial Judge: Hon. Leslie E. Kobayashi

#1265208

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was electronically served on the following parties through their respective attorneys through CM/ECF on the date set forth below unless otherwise noted:

To: **LEONARD D. DUBOFF, ESQ.** (*pro hac vice*)
EDWARD T. FU, ESQ. (*pro hac vice*)
The DuBoff Law Group, PC
6665 SW Hampton Street, Suite 200

Portland, Oregon 97223-8357
E-mail: lduboff@dubofflaw.com
efu@dubofflaw.com

LEO Y. SHIMIZU, ESQ.
Go Law Office LLC
1441 Kapiolani Blvd., Ste. 910
Honolulu, Hawaii 96814
E-Mail: leo@golaw-hi.com

Attorneys for Plaintiff
TRENDTEX FABRICS, LTD.

REX Y. FUJICHAKU, ESQ.
Bronster Fujichaku Robbins
1003 Bishop Street, Suite 2300
Honolulu, Hawaii 96813
E-Mail: rfujichaku@bfrhawaii.com

LENA N. BACANI, ESQ. (*pro hac vice*)
Loza & Loza LLP
305 N. Second Ave., #127
Upland, California 91786
E-Mail: Lena.bacani@lozaip.com

Attorneys for Defendants HUNG KY and NTKN, INC.
and Counterclaim Plaintiff NTKN, INC.

RANDALL YAMAMOTO, ESQ.
Yamamoto Kim, LLP
700 Bishop Street, Suite 1700
Honolulu, Hawaii 96813
E-mail: ryamamoto@yklp.net

Attorney for Defendant
SHAKA TIME, INC.

TROPIHOLIC, INC.
8321 SE Royal Street
Hobe Sound, Florida 33455

(served by U.S. Mail)

DATED: Honolulu, Hawaii, May 1, 2023.

/s/ Steven L. Goto
JEFFREY H. K. SIA
STEVEN L. GOTO
Attorneys for Counterclaim Defendant
TRENDTEX FABRICS, LTD.

CERTIFICATE OF SERVICE [Re: Counterclaim Defendant Trendtex Fabrics,
Ltd.'s Joinder in Plaintiff's Discovery Requests to NTKN, Inc. and Hung Ky];
Trendtex Fabrics, Ltd. v. NTKN, Inc., et al., Case No. 1:22-cv-00287-LEK-KJM,
United States District Court for the District of Hawaii
